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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



JUN 16 1998

REPLY TO THE ATTENTION OF

Mr. Joe Benedict

SR-6J

RE: Dupage County Landfill Superfund Site, IL

Dear Mr. Benedict:

Recently, you should have received a bill for the recovery of costs incurred by the U.S. Environmental Protection Agency (U.S. EPA) for oversight activity performed under the authority of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) as amended. These costs were incurred for the Dupage County Landfill Superfund Site.

U.S. EPA has worked to ensure that the costs incurred in connection with this site are controlled. U.S. EPA has worked to eliminate duplication of oversight activities, and has also endeavored to streamline the oversight work performed internally at U.S. EPA. Further, U.S. EPA has worked to control contractor costs, which are often a significant component of oversight costs, beginning with the contracting process and continuing through U.S. EPA's monitoring of the work performed (and costs incurred) on its behalf.

Generally, regarding contractor oversight support, U.S. EPA has established standard operating procedures to obtain contractor assistance and to monitor the implementation, progress, and cost of the contract support once the contractor's work assignment has been approved.

To obtain contractor assistance, the EPA site manager must write a Statement of Work (SOW) describing in detail the tasks to be done by the contractor. In addition, the EPA site manager must submit an Independent Government Cost Estimate (IGCE) for each of the tasks contained in the SOW. The IGCE provides an estimate of the number of hours and costs anticipated for the completion of the tasks identified in the SOW. It includes the costs of the direct labor, indirect labor costs (rent, utilities, etc.) travel costs, other direct costs, subcontractor costs, and base fees.

Based on the information contained in the SOW, the contractor prepares and submits a work plan. The work plan contains a detailed narrative of the tasks to be performed, along with a budget which identifies the hours and costs for each task. Upon receipt of the work plan, the EPA site manager, Project Officer and Contracting Officer review the work plan narrative to ensure the tasks are identical to those in the SOW and to ensure that the contractor's proposed hours and dollars are comparable with the IGCE. Significant differences in hours and dollars are identified and reconciled with the contractor before the work plan is approved and the contractor is allowed to proceed with the work.

Generally, after the work plan is approved and a work assignment issued, the site manager receives monthly progress reports from the contractor, including financial information. The U.S. EPA site manager reviews this information carefully and compares the cost figures to the work plan budget and the amount and type of work performed during the subject month. When this review is completed, the site manger signs a statement that the costs are (or are not) reasonable for the work performed. Any specific problems

that are identified (e.g., costs do not match work performed, contractor professional level exceeded the difficulty of the task, etc.) are addressed through discussions and or additional documentation to support the costs. If necessary or appropriate, payment for disputed costs may be withheld.

Taken together, these measures help to ensure that the costs billed to you are controlled.

Regarding the recently issued bill, U.S. EPA continues to work diligently to minimize its oversight costs. With your cooperation U.S. EPA was able to utilize time-critical and non-time critical and non-time critical and non-time critical authorities at the Site. Specifically, the leachate extraction system was mistance critical authority and the cap investigation and cap improvements were completed under non-time critical authority. These activities were conducted using these authorities to reduce the time and the cost associated with site response actions. Also, during this billing cycle, sampling and field oversight were reduced at the Dupage County Landfill Site by having U.S. EPA only send its contractor out on specific days for critical events.

In closing we believe that we have significantly increased the speed that site response actions occurred at the Dupage County Landfill and we have done so with reduced oversight costs. We recognized that these accomplishments were possible only through your continual corporation and would like to thank you for your efforts.

Sincerely,

Gladys Beard, Associate Remedial Project Manager

ladys Beard

cc: Michael Bellott, Remedial Project Manager Bruce Sypniewski Alan Youkeles